

Places for Everyone Representation 2021

Family Name	Nutt
Given Name	Ann
Person ID	1286954
Title	Stakeholder Submission
Type	Web
Family Name	Nutt
Given Name	Ann
Person ID	1286954
Title	Our Strategic Objectives
Type	Web
Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:	<ol style="list-style-type: none"> 1. Meet our housing need 2. Create neighbourhoods of choice 3. Ensure a thriving and productive economy in the districts involved 4. Maximise the potential arising from our national and international assets 5. Reduce inequalities and improve prosperity 6. Promote the sustainable movement of people, goods and information 7. Ensure that districts involved are more resilient and carbon neutral 8. Improve the quality of our natural environment and access to green spaces 9. Ensure access to physical and social infrastructure
Family Name	Nutt
Given Name	Ann
Person ID	1286954
Title	JP-S 5 Flood Risk and Water Environment
Type	Web
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	This area is already prone to flooding in parts. This issue, particularly Mort Lane has never been addressed properly. Covering fields with buildings and concrete will further impede drainage.
Family Name	Nutt
Given Name	Ann
Person ID	1286954
Title	JP-J 1 Supporting Long Term Economic Growth
Type	Web
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to	Being retired I am no comments to make on this section.

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co-operate. Please be as precise as possible.	
Family Name	Nutt
Given Name	Ann
Person ID	1286954
Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
Type	Web
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	There are too many houses in this small area.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Conserve and improve the existing housing stock
Family Name	Nutt
Given Name	Ann
Person ID	1286954
Title	JP-H 2 Affordability of New Housing
Type	Web
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	The proposals on offer are not for "affordable housing".
Family Name	Nutt
Given Name	Ann
Person ID	1286954
Title	JP-H 3 Type Size and Design of New Housing
Type	Web
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant,	Again, proposals on offer are not for affordable housing

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is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	
Family Name	Nutt
Given Name	Ann
Person ID	1286954
Title	JP-H 4 Density of New Housing
Type	Web
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Just because someone lives within a designated distance of any form of transport does not mean that transport can be accesses if the form in question is overcrowded or grid locked.
Family Name	Nutt
Given Name	Ann
Person ID	1286954
Title	JPA 35: North of Mosley Common
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	This area is consistently grid locked at different times of the day. As a resident of the area trying to move around the area the situation is already becoming intolerable. The new houses built on Mosley Common Road over the last few years has not helped the situation. The number of houses proposed would add to the delays and pollution generated. The schools and doctor's surgeries would not be able to cope with the number of extra people living in the area. Facilities such as shops are totally inadequate for the extra demand. Sewers and drains are unable at present to clear surface water adequately and covering large extra areas with concrete would exacerbate the situation. I cannot comment on the job situation being retired but hospital appointments early in the morning can involve at least a 35-40 minute queue to reach the East Lancashire Road.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the	Although understanding the need for extra housing this area would be adversely affected by any more building. Green spaces are necessary for mental and physical well being and being crammed in like rats is not the answer.

plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	
Family Name	Nutt
Given Name	Ann
Person ID	1286954
Title	Supporting Evidence
Type	Web

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Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	Stakeholder Submission
Type	Web
Include files	PFE1287302.pdf
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	Our Vision
Type	Web
Include files	PFE1287302.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>The vision for Greater Manchester has been desktop planned without proper engagement and consultation from the very beginning. Any consultations that have taken place have been a deterrent asking far too many intrusive questions of residents to put them off completing the consultations have been designed in such a way that they are difficult to respond to for residents with limited I.T skills or digital access. Local councils have not properly published the plan ensure a place for everyone plan is communicated to everyone. The plan should have been developed by the residents for the residents to address our actual housing requirements over the long term. The above demonstrates a clear lack of community involvement which goes against the spirit of the constitution and makes the preparation of this plan unsound.</p> <p>Legal Compliance</p> <p>-It is questionable whether PfE and the GMSF can effectively be treated as the same thing. This must be decided in court before "Places for Everyone" can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant (under Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if it was established. If there is any substantial difference in scope between the GMSF and PfE, it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a significant number of people who have seen some form of change." So, is "not insignificant" the same as "substantial"? If the plan is not legal. This can only be established by a proper judicial review. So until proper legal advice is taken the plan must be considered illegal and not put to Government.</p> <p>Soundness</p> <p>-The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p>

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-There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid

-There are no partners or industries identified for employment provision. Major partners provision should be identified.

-There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information designed to encourage rather than discourage public input.

-The site selection process has been opaque with no explanation as to why some sites "were excluded from the plan.
https://mappinggm.org.uk/call-for-sites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public should be held and minutes should be published. The rationale for the selection/rejection should be available including considered alternatives.

-Several of the authorities involved have consistently failed to meet housing delivery targets. A plan must be deliverable. The plan relies on the cooperation of property developers. An indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on targets. Clear delivery plans for infrastructure should be included.

-PfE shows removal of greenbelt protection for some areas and creation of greenbelt elsewhere. There is no proof of exceptional circumstances required in the National Planning Policy Framework for this.

-In addition to PfE each authority needs to come up with its own local plan. No details about when these plans will be available.

-There are no details of how Duty to Cooperate will be achieved. Following their withdrawal will effectively become a neighbouring borough. However, it is not acceptable to limit other boroughs to Stockport since each of the authorities in the plan is also neighbouring to areas outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.

-A change in the methodology for Manchester City Council was resulted in a 35% up in housing need for Manchester City Council area. The revised Local Housing Need methodology states that the need is to be met within the district and not redistributed (see Places for Everyone Joint Consultation documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii)
https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021
 This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.

<p>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</p>	<p>This plan needs to go back to Regulation 18 of the Town and Country planning act as it was prepared with proper public engagement and consultation.</p>
<p>Family Name</p>	<p>Nuttall</p>
<p>Given Name</p>	<p>Donna</p>
<p>Person ID</p>	<p>1287302</p>
<p>Title</p>	<p>Our Strategic Objectives</p>
<p>Type</p>	<p>Web</p>
<p>Include files</p>	<p>PFE1287302.pdf</p>

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<p>Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:</p>	<ol style="list-style-type: none"> 1. Meet our housing need 2. Create neighbourhoods of choice 3. Ensure a thriving and productive economy in the districts involved 4. Maximise the potential arising from our national and international assets 5. Reduce inequalities and improve prosperity 6. Promote the sustainable movement of people, goods and information 7. Ensure that districts involved are more resilient and carbon neutral 8. Improve the quality of our natural environment and access to green spaces 9. Ensure access to physical and social infrastructure 10. Promote the health and wellbeing of communities
<p>Soundness - Positively prepared?</p>	<p>Unsound</p>
<p>Soundness - Justified?</p>	<p>NA</p>
<p>Soundness - Consistent with national policy?</p>	<p>NA</p>
<p>Soundness - Effective?</p>	<p>NA</p>
<p>Compliance - Legally compliant?</p>	<p>No</p>
<p>Compliance - In accordance with the Duty to Cooperate?</p>	<p>No</p>
<p>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</p>	<p>Please take the time to read in full the supporting documents I have provided to you this plan fails on all the above points.</p>
<p>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</p>	<p>Please take the time to read in full the supporting documents I have provided to you this plan fails on all the above points.</p>
<p>Family Name</p>	<p>Nuttall</p>
<p>Given Name</p>	<p>Donna</p>
<p>Person ID</p>	<p>1287302</p>
<p>Title</p>	<p>Our Spatial Strategy</p>
<p>Type</p>	<p>Web</p>
<p>Include files</p>	<p>PFE1287302.pdf</p>
<p>Soundness - Positively prepared?</p>	<p>Unsound</p>

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Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	GMCA made the decision to move a poorly prepared plan forward to the publication s and Country planning Act even though major changes have been made to the plan s of consultation. For example Stockport withdrew from what was the GMSF and Manche has had a 35% uplift applied to their housing targets to be met within that specific are the plan has changed significantly and therefore requires going back to proper consulta directly affected to comment further.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	As above the plan needs to go back to proper consultation with the residents of Grea
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 1 Core Growth Area
Type	Web
Include files	PFE1287302.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Nuttall
Given Name	Donna
Person ID	1287302

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Title	JP-Strat 2 City Centre
Type	Web
Include files	PFE1287302.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 3 The Quays
Type	Web
Include files	PFE1287302.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 4 Port Salford
Type	Web
Include files	PFE1287302.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

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Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 5 Inner Areas
Type	Web
Include files	PFE1287302.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 6 Northern Areas
Type	Web
Include files	PFE1287302.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 7 North East Growth Corridor
Type	Web
Include files	PFE1287302.pdf
Soundness - Positively prepared?	Unsound

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Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 8 Wigan Bolton Growth Corridor
Type	Web
Include files	PFE1287302.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 9 Southern Areas
Type	Web
Include files	PFE1287302.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Nuttall
Given Name	Donna

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Person ID	1287302
Title	JP-Strat 10 Manchester Airport
Type	Web
Include files	PFE1287302.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 11 New Carrington
Type	Web
Include files	PFE1287302.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 12 Main Town Centres
Type	Web
Include files	PFE1287302.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound

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Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 13 Strategic Green Infrastructure
Type	Web
Include files	PFE1287302.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-Strat 14 A Sustainable and Integrated Transport Network
Type	Web
Include files	PFE1287302.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JPA 7: Elton Reservoir Area
Type	Web
Include files	PFE1287302.pdf

Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Elton Reservoir Proposal (JPA-7)</p> <p>-The PfE indicates in Para 1.63 point 2 that the most up to date information be used so being the most recent Bury's Housing Development Needs Assessment 2020 under consideration: https://www.bury.gov.uk/index.aspx?articleid=15866</p> <p>-The site selection process for Bury has been especially opaque. Little information has been provided about why other more apparently suitable sites were rejected, or what alternatives were considered. Bury Council admitted in a Freedom of Information response that site selection was done through a series of informal meetings with no list of attendees or minutes available. This site choice was presented as the most appropriate when no reasonable alternatives appear to have been examined. The Elton Reservoir site does not meet the selection criteria laid down in the NPPF or the GMCA. https://www.bury.gov.uk/index.aspx?articleid=16330 Radcliffe the location of Elton Reservoir is the least expensive housing in Bury but was selected in preference to sites in other areas where less housing is required.</p> <p>-Para 11.105 p 264 states: " The allocation [Elton Reservoir] is almost entirely surrounded by existing urban area" Filling this green belt site in will contribute to creating urban sprawl and non-compliance with National Policy NPPF para 134 parts a,c and e.</p> <p>-Para 11.105 p 264 states: "Although the allocation has the capacity to deliver a total of 1,900 new homes, it is anticipated that around 1,900 of these will be delivered within the plan period. Nevertheless, it is considered necessary to release the site in full at this stage given the proposed development means that it will need to be supported by significant strategic infrastructure and this level of investment needs the certainty that the remaining development will be delivered to come forward beyond the plan period". Such gross over release of greenbelt is entirely contrary to National Guidelines, which regards greenbelt as a precious resource not to be squandered. It is necessary to identify the source of infrastructure funding, indeed shortfalls are expected see paragraph 11.105. Site owners Peel are not specifically mentioned as being a contributor to the infrastructure. Questions should be asked regarding the reasons for Bury Council offering up a huge release of greenbelt at Elton Reservoir that is not required during the plan period (and may never be required) instead of retaining it in accordance with National Policy.</p> <p>-The Elton site apparently cost Peel £27M (as detailed in the site allocation topic paragraph 11.105) for 260 hectares (£104K per hectare) as greenbelt. Allowing a conservative price uplift of 50% for green belt conversion to development land, the land for the initial 1900 site becomes worth £875M. Adding in the land for the totally unjustified additional housing beyond the plan period costs approx. another £750 M. The implication being that unless Peel get the whole £1.325M they can't offer any upfront funding for the infrastructure. Infrastructure that would not be provided if the development does not go ahead. Peel have indicated that they will possibly build the infrastructure but will definitely split the site into lots to be developed by other developers so they (Peel) can make contributions this way. It would be left to Bury to extract the funding from other as yet to be identified developers. Bury have a very poor reputation for obtaining developer contributions for infrastructure and developers always try to wriggle out of any obligations. It seems Peel have duped Bury into ignoring National Policy and granting them a huge financial bonus with no commensurate contribution anything.</p> <p>-Site wildlife, flood risk and other surveys have been carried out by consultancies on behalf of Bury for by developers rather than entirely independent wildlife organisations or the Department for Environment so must be considered potentially biased. This is particularly important a</p>

as there are currently problems with the reservoir wall which are being addressed by Rivers trust. These measures may be suitable for providing some protection to open fi suitable to protect homes from flooding if there is a breach? Such surveys should be enti of benefiter influence.

-As part of the infrastructure a new secondary school for Radcliffe is mentioned. A new school for Radcliffe is already planned funded by the Government. The proposed ne even cater for existing Radcliffe pupil numbers. Since the proposed school is indicate already reserved for the free school we must assume PfE document refers to the sch planned. Regeneration for Radcliffe the location of the Elton Reservoir development is as part of the infrastructure funding. A regeneration plan for Radcliffe is already in pla have applied for Government levelling up funding and have stated that even if the ap not succeed the regeneration will go ahead using existing Council money. Bury Coun that regeneration and the new school for Radcliffe are not dependent on PfE going a mention/implication that PfE will contribute to providing a new secondary school (unle school) and regeneration for Radcliffe must be removed from JPA-7.

-Bury Council have consistently failed to meet housing delivery targets and are now To be effective a plan must actually be deliverable. The plan relies heavily on the coo property developers. There is no indication of how they will be made to keep up with sanctions will apply if they don't. At a Council meeting held on 9/9/21 the Leader of Eammon O'Brien confirmed that it was "unlikely" that the proposed building rates for a in Bury (as laid out in JPA7 Elton Reservoir Topic Paper PfE 2021, section 27.8 page met as they were "unrealistic". So the plan cannot be considered to be effective. So effectiveness test for Soundness.

-As part of the overall plan Bury have modified green belt boundaries and allocations to make it appear that less Greenbelt is being sacrificed. So the loss of the Elton Reservoir has been partially offset by creating extensive greenbelt in other areas without justify circumstances. This is not in accordance with National Policy.

-PfE puts the majority of housing in the West of Bury (Elton Reservoir site) while loca the East side of Bury on the M66 Northern Gateway corridor completely the other sid congested Bury. The proposed new link road will not help this problem as it links one to another.

-PfE para1.42 states: "The majority of development between 2021 and 2037 (the "pl be on land within the urban area, most of which is brownfield land" PfE favours a brow wherever possible as does National Policy. Bury Council have informed the public in will implement a brownfield first policy; however, they are going for immediate green JPA7 Elton Reservoir Topic Paper PfE 2021, section 27.9 page 52). When questione meeting on 9/9/21 the Leader of the Councillor Eammon O'Brien clarified this statem that for anything the council themselves build they would adopt a brownfield first poli that the council have no control over the actions of private developers, in reality they c limit the release of green belt sites in accordance with National Policy NPPF 134 par

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Removal of JPA 7 allocation Elton Reservoir from the plan

Family Name

Nuttall

Given Name

Donna

Person ID

1287302

Title

JP-D1 Infrastructure Implementation

Places for Everyone Representation 2021

Type	Web
Include files	PFE1287302.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Due to the size of the greenbelt sites allocated within the plan it is highly unlikely that they can be provided in good time to bring these sites forward within the plan period. This makes the plan deliverable within the plan period hence making it unsound.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Smaller sites should be considered that would come forward faster like brownfield sites which have substantial infrastructure provided close by.
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	JP-D2 Developer Contributions
Type	Web
Include files	PFE1287302.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No

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Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	It is very well documented that once a site is approved for development it can be revalued with a viability assessment. Local councils have very little control after a site has been approved for houses and it is common practice for a developer to change the number of homes, density, type and number that are classed as affordable. In some extreme cases a developer can have inflated development costs and no section 106 payments will come forward.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Local council authorities need to enter into more housing partnership projects and develop land they own instead of selling it and losing control. Salford Council has now created its own building company that will deliver affordable homes on land they own and other councils can follow suit.
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	Bury - Green Belt Additions
Type	Web
Include files	PFE1287302.pdf
GBA Bury - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below	<p>Bury GBA03 Pigs Lea Brook 1</p> <p>Bury GBA04 North of Nuttall Park</p> <p>Bury GBA05 Pigs Lea Brook 2</p> <p>Bury GBA06 Hollins Brook</p> <p>Bury GBA07 Off New Road, Radcliffe</p> <p>Bury GBA08 Hollins Brow</p> <p>Bury GBA09 Hollybank Street, Radcliffe</p> <p>Bury GBA10 Crow Lumb Wood</p> <p>Bury GBA11 Nuttall West, Ramsbottom</p> <p>Bury GBA12 Woolfold, Bury</p> <p>Bury GBA13 Nuttall East, Ramsbottom</p> <p>Bury GBA14 Chesham, Bury</p> <p>Bury GBA15 Broad Hey Wood North</p> <p>Bury GBA16 Lower Hinds</p>
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Net greenbelt additions have been nothing but a play on numbers to promote the plan for more greenspace. A lot of the new greenbelt additions are currently not viable for building, they are simply an exercise to take away the protection of greenbelt from usable open greenspace and move them elsewhere in the borough to give the impression that the overall net greenbelt additions are more, when in fact it is less.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Leave the greenbelt boundaries unchanged and present the true loss of greenbelt in the plan proposals.
Family Name	Nuttall
Given Name	Donna
Person ID	1287302
Title	Supporting Evidence
Type	Web
Include files	PFE1287302.pdf
Redacted comment on supporting documents - Please give details of why you consider any of the evidence not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Legal Compliance</p> <p>-It is questionable whether PfE and the GMSF can effectively be treated as the same plan. This must be decided in court before 'Places for Everyone' can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if it was established. If there is any substantial difference in scope between the GMSF and PfE it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states 'The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a number of the plan have seen some form of change.' So, is 'not insignificant' the same as 'substantial' and if so is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government.</p> <p>Soundness</p> <p>Soundness</p> <p>-The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p> <p>-There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid for.</p> <p>-There are no partners or industries identified for employment provision. Major partners and industries for employment provision should be identified.</p> <p>-There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local pro</p>

public consultations should be repeated, providing clear, understandable information designed to encourage rather than discourage public input.

-The site selection process has been opaque with no explanation as to why some sites' were excluded from the plan.

https://mappinggm.org.uk/call-for-sites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with the public should be held and minutes should be published. The rationale for the selection/rejection of sites should be available including considered alternatives.

-Several of the authorities involved have consistently failed to meet housing delivery targets. A plan must be deliverable. The plan relies on the cooperation of property developers. There should be an indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on its targets. Clear delivery plans for infrastructure should be included.

-PfE shows removal of greenbelt protection for some areas and creation of greenbelt elsewhere. There is no proof of exceptional circumstances required in the National Planning Policy Framework for this.

-In addition to PfE each authority needs to come up with its own local plan. No details of when these plans will be available.

-There are no details of how Duty to Cooperate will be achieved. Following their withdrawal, Stockport will effectively become a neighbouring borough. However, it is not acceptable to limit the plan to Stockport since each of the authorities in the plan is also neighbouring to areas outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn, Wigan neighbours St Helens and Trafford neighbours Cheshire area.

-A change in the methodology for Manchester City Council was resulted in a 35% up in housing need for the Manchester City Council area. The revised Local Housing Need methodology states that the need is to be met within the district and not redistributed (see Places for Everyone Joint Consultation documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021) This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.